

[illegible]

-against-

Defendants.

: NOTICE OF MOTION  
FOR PARTIAL  
: SUMMARY JUDGMENT

s/Jeffrey E. Fogel  
Jeffrey E. Fogel (JF-3948)  
New York Civil Liberties Union  
Foundation  
125 Broad Street, 19<sup>th</sup> Floor  
New York, NY 10004  
(212) 607-3363